



Coastal Podiatry Group

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The Anesthetic and Life Support Drugs Advisory Committee
In care of: Kimberly Topper
Center for Drug Evaluation and Research (HFB-21)
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

To Whom It May Concern:

Podiatric
Medicine

Thank you for this opportunity to share the concerns of our practice regarding the abuse potential, diversion and increasing incidence of addiction to opiate analgesics, especially to the modified release opiate analgesics. It has been our experience in treating pain during the post-operative period that appropriate use of slow release Oxycodon or several days following surgery, on a continuous basis can be augmented with rapid release analgesics to produce a non-sedating and effective analgesic result. This "oral patient controlled analgesia" has reduced the need for hospitalization and improved returns to physical activity. It is well known that appropriate acute pain control results in a lower incidence of post-operative complications and improve returns to activity.

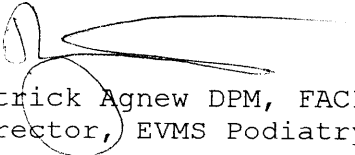
Reconstructive
Foot Surgery

Although I agree with reasonable efforts to prevent diversion and abuse of these substances, I do not believe that the vast majority of patient's treated appropriately should be punished for the misbehavior of others. Since no substitutes for these drugs are as effective or able to be used in the same manner, I will respectfully request that you avoid any action which might impair the ability of surgeons to prescribe these medications appropriately.

Infants,
Children and
Adults

Kindest regards,

Sports
Medicine


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Diabetic
Foot Care